UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:	)	Chapter 7
	)	
ALEXANDER S. VASILESKI,	)	Case No. 16-28563
	)	
Debtor.	)	Judge Timothy A. Barnes
	)	

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on Tuesday, January 3, 2017, at 10:00 a.m., I shall appear before the Honorable Judge Timothy A. Barnes, Bankruptcy Judge in Room 744, at the Dirksen Federal Courthouse, 219 South Dearborn Street, Chicago, Illinois, or before any other Bankruptcy Judge who may be sitting in his place and shall present a **MOTION OF THE UNITED STATES TRUSTEE FOR ORDER REOPENING CHAPTER 7 CASE AND AUTHORIZING THE APPOINTMENT OF A CHAPTER 7 TRUSTEE**, a copy of which is attached and served on you.

/s/ *Adam G. Brief*
Adam G. Brief, Assistant U.S. Trustee
OFFICE OF THE U.S. TRUSTEE
219 South Dearborn Street, Room 873
Chicago, Illinois 60604
(312) 886-2805

CERTIFICATE OF SERVICE

I, Adam G. Brief, an attorney, state that pursuant to Local Rule 9013-1(D) the above **NOTICE OF MOTION** and the appended **MOTION OF THE UNITED STATES TRUSTEE FOR ORDER REOPENING CHAPTER 7 CASE AND AUTHORIZING THE APPOINTMENT OF A CHAPTER 7 TRUSTEE** were filed on December 12, 2016, and served on all parties identified as Registrants on the service list below through the Court's Electronic Notice for Registrants and, as to all other parties on the service list below, I caused a copy to be sent via First Class Mail to the address(es) indicated on December 12, 2016.

/s/ *Adam G. Brief*

SERVICE LIST
ALEXANDER S. VASILESKI
16-28563

Registrants Served Through the Court's Electronic Notice for Registrants:

O. Allan Fridman allanfridman@gmail.com
Ira Bodenstein iratrustee@shawfishman.com

Parties Served via First Class Mail:

Alexander S. Vasileski
416 East North Water Street
Chicago, IL 60611

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:	)	Chapter 7
	)	
ALEXANDER S. VASILESKI,	)	Case No. 16-28563
	)	
Debtor.	)	Judge Timothy A. Barnes
	)	

MOTION FOR ORDER REOPENING CHAPTER 7 CASE
AND AUTHORIZING THE APPOINTMENT OF A CHAPTER 7 TRUSTEE

NOW COMES PATRICK S. LAYNG, the United States Trustee for the Northern District of Illinois, by his attorney, Adam G. Brief, and asks the Court to enter an order reopening this case and authorizing the United States Trustee to appoint a Chapter 7 trustee for the estate. As his reasons for this request, the United States Trustee states to the Court as follows.

1. This is a core proceeding under Title 28, Section 157(b)(2)(A) of the United States Code which this Court may hear and determine pursuant to IOP 15(A) and Local Rule 40.3.1(a) of the United States District Court for the Northern District of Illinois.

2. The Debtor filed a Chapter 7 case on September 6, 2016. On or around that same date the U.S. Trustee appointed Ira Bodenstein trustee in the Debtor's case. On October 4, 2016, the trustee filed his Report of No Distribution with the Court. The Clerk of the Court closed the Debtor's case on December 5, 2016. Since then, the U.S. Trustee has become aware of assets.

3. The U.S. Trustee believes the potential receipt of additional estate funds is cause to reopen this bankruptcy case under § 350(b) of the Bankruptcy Code. Receipt of these funds is also grounds for the Court to authorize the appointment of a trustee under Fed.R.Bank.P. 5010 to administer estate property for the benefit of the Debtor's creditors.

WHEREFORE, the U.S. Trustee requests the Court to enter an order reopening Debtor's case and authorizing the United States Trustee to appoint a Chapter 7 trustee and for such other relief as is just.

RESPECTFULLY SUBMITTED:
PATRICK S. LAYNG
UNITED STATES TRUSTEE

DATED: December 12, 2016

BY: /s/ *Adam G. Brief*

Adam G. Brief, Assistant U.S. Trustee
OFFICE OF THE U.S. TRUSTEE
219 South Dearborn Street, Room 873
Chicago, Illinois 60604
(312) 886-2805